

# **EXHIBIT 7**

Taft/

Taft Stettinius & Hollister LLP

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August 27, 2007

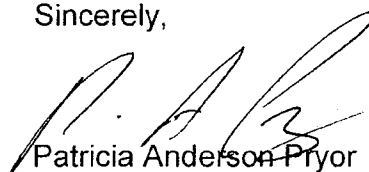
Susan Donahue  
Robert Childs  
Herman N. Johnson, Jr.  
Wiggins, Childs, Quinn & Pantazis P.C.  
The Kress Building  
301 19th Street North  
Birmingham, Alabama 35203

Re: Bert et al. v. AK Steel

Dear Counselors:

Enclosed please find Defendant's Objections and Responses to Plaintiffs'  
Second Request for Production of Documents.

Sincerely,



Patricia Anderson Pryor

PAP:sls

Enclosures

cc: Paul Tobias (w/encl.)  
David Sanford (w/encl.)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

VIVIAN BERT, et al.,	:	Case No. C-1-02-467
	:	
Plaintiffs,	:	Judge Beckwith
	:	
v.	:	DEFENDANT'S OBJECTIONS AND
	:	RESPONSES TO PLAINTIFFS' SECOND
AK STEEL CORPORATION,	:	REQUEST FOR PRODUCTION OF
	:	<u>DOCUMENTS</u>
Defendant.	:	

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendant AK Steel Corporation ("AK Steel") makes the following responses and objections to Plaintiffs' Second Request for the Production of Documents as set forth below.

Defendant makes the following general objections which are incorporated into all of the following responses to Plaintiffs' document requests:

1. Only relevant and discoverable information shall be provided.
2. No attorney-client privilege or work-product information shall be provided. To the extent that any privileged information is provided, it shall not constitute a waiver of the privilege as to any other information.
3. Defendant reserves the right to seek protection from disclosure of confidential or proprietary information.
4. Defendant reserves the right to object to the use of any document provided pursuant to these document requests in any subsequent proceeding or in the trial of this or any other action on any ground.

5. Defendant reserves the right to object on any ground at any time to a demand for further responses to these document requests or to further document requests.

6. Defendant reserves the right at any time to revise, correct, add to or clarify any of the responses or objections herein.

Documents will be produced at a time of mutual convenience at the offices of Taft Stettinius & Hollister LLP, 425 Walnut Street, Suite 1800, Cincinnati, Ohio 45202-3957.

### **REQUESTS FOR PRODUCTION**

1. Any and all tests administered by AK Steel or any of its agents for hourly bargaining unit candidates for employment at its Middletown, Ohio, location and Ashland, Kentucky, location, from February, 2001 until the present.

### **RESPONSE:**

Objection. This request is overbroad and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Objecting further, this request seeks confidential information. Notwithstanding and without waiving the objections, upon entry of an appropriate and mutually agreeable protective order, AK Steel will produce all tests used to hire hourly entry-level laborer or labor reserve bargaining unit candidates for employment at its Middletown, Ohio and Ashland, Kentucky location during the relevant period, August 12, 2001 through October 31, 2003.

2. Any and all validation studies conducted by AK Steel or by any of its agents pursuant to the EEOC's Uniform Guidelines on Employee Selection Procedures for the tests administered by AK Steel or any of its agents for hourly bargaining unit candidates for

employment at its Middletown, Ohio location and its Ashland, Kentucky location from February, 2001 to the present.

**RESPONSE:**

There are no validation studies from February 2001 to the present relating to the pre-employment test challenged in this lawsuit.

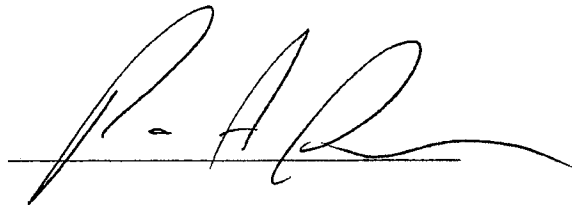
Respectfully submitted,

A handwritten signature in black ink, appearing to read "L. Barty", is written over a horizontal line.

Lawrence J. Barty (0016002)  
Gregory Parker Rogers (0042323))  
Patricia Anderson Pryor (0069545)  
Taft Stettinius & Hollister LLP  
425 Walnut Street, Suite 1800  
Cincinnati, Ohio 45202  
(513) 381-2838  
Trial Attorneys for Defendant  
AK Steel Corporation

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was sent via regular U.S. mail on August \_\_\_\_, 2007 to Susan Donahue, Robert Childs, Herman N. Johnson, Jr., Wiggins, Childs, Quinn & Pantazis, P.C., The Kress Building, 301 19th Street North, Birmingham, Alabama 35203; Paul H. Tobias Tobias, Kraus & Torchia, 911 Mercantile Library Building, 414 Walnut Street, Cincinnati, Ohio 45202; and David Sanford, Sanford, Wittels & Heisler, L.L.P., 1666 Connecticut Avenue, N.W., Suite 310, Washington, D.C. 20009.

A handwritten signature in black ink, appearing to read "P. A. R.", is written over a horizontal line.